

Attachment 1

United States District Court for the Southern District of Mississippi
United States v. Hinds County, et al., No. 3:16-cv-489 CWR-JCG

Plaintiff's Hearing Exhibit List

Hearing Exhibit #	Deposition Exhibit #	Hearing Exhibit Description	Expect to Use / May Use	Defendant's Objections	Confidentiality
PX 001	Exhibit 1; also 24, 41	Notice of Depositions (ECF No. 40, filed September 6, 2019)	Expect to Use		
PX 002	Exhibit 2; also 42,59,83	Priority Recommendations, June 2018	Expect to Use		
PX 003	Exhibit 3	Hinds County Adult Detention Center Initial Remedial Plan	Expect to Use		
PX 004	Exhibit 4	Letter from Claire Barker to Carmen Davis dated August 14, 2018 re FY 2019 Budget Increase Request	Expect to Use		
PX 005	Exhibit 5_Redacted	Incident Report for Incident #181434	Expect to Use		PII - REDACTED
PX 006	Exhibit 6_Redacted	Incident Report for Incident #181435	Expect to Use		PII - REDACTED
PX 007	Exhibit 7_Redacted	Incident Report for Incident #181486	Expect to Use		PII - REDACTED
PX 008	Exhibit 8	Incident Report for Incident #181487	Expect to Use		
PX 009	Exhibit 9_Redacted	Incident Report for Incident #181498	Expect to Use		PII - REDACTED
PX 010	Exhibit 10_Redacted	Incident Report for Incident #181500	Expect to Use		PII - REDACTED
PX 011	Exhibit 11	Incident Report for Incident #181593	Expect to Use		PII - REDACTED
PX 012	Exhibit 12_Redacted; also 44	Internal Affairs Investigation for Use of Force, Incident #181593	Expect to Use		PII - REDACTED
PX 013	Exhibit 13_Redacted	Supplemental Incident Report for Incident #181583	Expect to Use		PII - REDACTED
PX 014	Exhibit 14_Redacted	Incident Report for Incident #181913	Expect to Use		PII - REDACTED
PX 015	Exhibit 15_Redacted	Incident Report #181965	Expect to Use		PII - REDACTED
PX 016	Exhibit 16	Incident Report for Incident #1900342	Expect to Use		
PX 017	Exhibit 17_Redacted	Incident Report for Incident #1900344	Expect to Use		PII - REDACTED
PX 018	Exhibit 18_Redacted; also 50	Incident Report for Incident #1900673	Expect to Use		PII - REDACTED
PX 019	Exhibit 19_Redacted; also 51	Incident Report for Incident #1900748	Expect to Use		PII - REDACTED
PX 020	Exhibit 20	Incident Report for Incident #191164	Expect to Use		
PX 021	Exhibit 21_Redacted	Incident Report for Incident #191291	Expect to Use		PII - REDACTED
PX 022	Exhibit 22_Redacted	Incident Report #191337	Expect to Use		PII - REDACTED
PX 023	Exhibit 23_Redacted	Incident Report #191379	Expect to Use		PII - REDACTED

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PX 024	Exhibit 25	Work Order Request for RDC and Work Center, September 16-20, 2019	Expect to Use		
PX 025	Exhibit 26	Proposal to install remote control panel and replace cooling and heating valves for Pod C-3 Air Handler at RDC, dated February 6, 2019	Expect to Use		
PX 026	Exhibit 27	Department of Justice Maintenance Report of Detention Centers, September 16-20, 2019	Expect to Use		
PX 027	Exhibit 28	Documents related to the Raymond Detention Center A-POD Renovation	Expect to Use		
PX 028	Exhibit 29	Documents related to the Raymond Detention Center B-POD Renovation	Expect to Use		
PX 029	Exhibit 30	Photographs of the Raymond Detention Center	Expect to Use		
PX 030	Exhibit 31	Documents related to the Raymond Detention Center C-POD Renovation	Expect to Use		
PX 031	Exhibit 32	Notes from Meeting with Raymond Detention Staff re renovations, May 29, 2019	Expect to Use		
PX 032	Exhibit 33	Work Order Request for RDC and Work Center, June 3, 2019 - June 7, 2019	Expect to Use		
PX 033	Exhibit 34	Raymond Detention Center Renovation Cost Analysis	Expect to Use		
PX 034	Exhibit 35	Midsouth Repair Proposal 9/27/18	Expect to Use		
PX 035	Exhibit 36	RDC Booking Renovation	Expect to Use		
PX 036	Exhibit 37	Photographs: C-POD Renovation	Expect to Use		
PX 037	Exhibit 38	Floorplan (RDC)	Expect to Use		
PX 038	Exhibit 39	Memorandum regarding the repair of the mechanical doors at the Raymond Detention Center	Expect to Use		Offered Under Seal

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PX 039	Exhibit 40	NEF 30-8 Priority Recommendations June 2018	Expect to Use		
PX 040	Exhibit 45	Incident Report for Incident #181563	Expect to Use		
PX 041	Exhibit 46_Redacted	Incident Report for Incident #181593	Expect to Use		PII - REDACTED
PX 042	Exhibit 48	Incident Report for Incident #1900627	Expect to Use		
PX 043	Exhibit 49	Incident Report for Incident #1900667	Expect to Use		
PX 044	Exhibit 52_Redacted	Incident Report for Incident #1900757	Expect to Use		PII - REDACTED
PX 045	Exhibit 53_Redacted	Incident Report for Incident #191058	Expect to Use		PII - REDACTED
PX 046	Exhibit 54_Redacted	Incident Report for Incident #191259	Expect to Use		PII - REDACTED
PX 047	Exhibit 55_Redacted	Incident Report for Incident #191294	Expect to Use		PII - REDACTED
PX 048	Exhibit 56_Redacted	Incident Report #19-00001337	Expect to Use		PII - REDACTED
PX 049	Exhibit 57	Notice of Depositions dated September 30, 2019	Expect to Use		
PX 050	Exhibit 60; also 68, 78, 95	Email from Synarus Green to Shelley Blanc re Salary Step Plan	Expect to Use		
PX 051	Exhibit 61; aslo 85	Email from Synarus Green to Sheriff Victor Manson and others regarding Compliance Monitoring Working Groups	Expect to Use		
PX 052	Exhibit 62	Memorandum from Synarus Green to Sheriff Victor Mason regarding Concerns for Safety/Security at the Raymond Detention Center	Expect to Use		
PX 053	Exhibit 63; also 86	Email from Synarus Green to Sheriff Victor Mason and others regarding Working Group Meeting	Expect to Use		
PX 054	Exhibit 64; also 88	Email from Synarus Green to Christopher Cheng attaching memorandum regarding Working Groups & Assigned Priorities	Expect to Use		

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PX 055	Exhibit 65; also 91	Use of Force, Policy #03.0006 (April 1, 2017)	Expect to Use		
PX 056	Exhibit 66; also 92	Email from Synarus Green to Sheriff Victor Mason regarding Staffing and Workforce Development for Detention Services	Expect to Use		
PX 057	Exhibit 67; also 77, 93	Email Synarus Green to Sheriff Victor Mason regarding Meeting Announcement - HCCD Steering Committee - August 7, 2017	Expect to Use		
PX 058	Exhibit 69	Email from Mary Rushing to Pete Luke regarding Moving of Staff from Detention Division	Expect to Use		
PX 059	Exhibit 70	Email from Pete Luke to Claire Baker and others regarding Staffing for Detention Services	Expect to Use		
PX 060	Exhibit 71	Email from Pete Luke to Claire Baker and others regarding Deputies for Hospital Supervision	Expect to Use		
PX 061	Exhibit 72	Detention Services Staffing Report (May 1, 2019)	Expect to Use		
PX 062	Exhibit 73	Memorandum from Pete Luke to Sheriff Victor Mason regarding Assistance at RDC (June 28, 2019)	Expect to Use		
PX 063	Exhibit 74	Email from Mary Rushing to Sheriff Victor Mason and others regarding HC Detention Services Total Employees, attaching RDC Roster (July 8, 2019)	Expect to Use		Offered Under Seal
PX 064	Exhibit 75	Priority Recommendation Action Plan	Expect to Use		

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PX 065	Exhibit 76	Memorandum to Carmen Davis from Captain Leon Shields regarding Needed Repairs to Raymond Detention Center (July 21, 2017)	Expect to Use		
PX 066	Exhibit 79	Letter from Dr. Nanetta Payne to Carmen Davis	Expect to Use		
PX 067	Exhibit 80; also 96	Email from Synarus Green to Darrel McQuirter and others regarding Meeting Reminder & Meeting Update (August 22, 2017)	Expect to Use		
PX 068	Exhibit 81	Letter from Sheriff Victor Mason to Department of Justice Monitors attaching Raymond Detention Safety Repair Timeline (Feb. 28, 2018)	Expect to Use		
PX 069	Exhibit 84	Declaration of Synarus Green dated July 22, 2019	Expect to Use		
PX 070	Exhibit 85	Email from Synarus Green to Sheriff Victor Mason regarding Compliance Monitoring Working Groups (March 2, 2017)	Expect to Use		
PX 071	Exhibit 87_Redacted	April 6, 2017 Memo from Warden Rushing to Coordinator Green, Subject: IAD investigation Juvenile (Assault)	Expect to Use		
PX 072	Exhibit 89	E-mail from Synarus Green to Monitor Simpson and others regarding Hinds County Detention Division Services Policy and Procedures (April 18, 2017)	Expect to Use		
PX 073	Exhibit 90	Classification Policy #03.004, April 1, 2017	Expect to Use		

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PX 074	Exhibit 94	Email from Synarus Green to Monitor Simpson and others regarding Subject Detention Division Services (forwarding Email from Mary Rushing to Sheriff Victor Mason) (August 8, 2017)	Expect to Use		
PX 075	Exhibit 97	Email from Synarus Green to Pieter Teeuwissen, Lisa Simpson, and others regarding Grand Jury Report - 4.10.18 (April 20, 2018)	Expect to Use		
PX 076	Exhibit 98_Redacted	Hinds County Sheriffs Office Incident Narratives By Date (August 1, 2019)	Expect to Use		Offered Under Seal
PX 077	Exhibit 99_Redacted	RDC Incident Narratives By Date for September 2019	Expect to Use		Offered Under Seal
PX 078		Copy of HCDS - Monthly Incidents Summary - October 2019	Expect to Use		Offered Under Seal
PX 079		HCDS - Monthly Incidents Summary - October 2019	Expect to Use		Offered Under Seal
PX 080		Hinds County Incident Report Chart	May Use		Offered Under Seal
PX 081		Incident Narratives by Date	Expect to Use		Offered Under Seal
PX 082		Hinds County Sheriffs Office Incidents By Date for July 2019	Expect to Use		Offered Under Seal
PX 083		July incident log	Expect to Use		Offered Under Seal
PX 084		Hinds County Sheriffs Office Incident Narratives By Date for July 2019	Expect to Use		Offered Under Seal
PX 085		July Narrative log	Expect to Use		Offered Under Seal
PX 086		June incidents chart	Expect to Use		Offered Under Seal
PX 087		RDC September 2019 Incidents by Date	Expect to Use		Offered Under Seal
PX 088		September 2019 incident by Date	Expect to Use		Offered Under Seal
PX 089		September 2019 Incidents Narratives By Date	Expect to Use		Offered Under Seal

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PX 090		September 2019 incident Narratives by Date	Expect to Use		Offered Under Seal
PX 091		Biographical Statement for David M. Parrish	Expect to Use		PII - REDACTED
PX 092		Elizabeth Simpson Resume 2019	Expect to Use		PII - REDACTED
PX 093		David M. Parrish Resume 2019	Expect to Use		PII - REDACTED
PX 094		Jim Moeser Resume, November 2019	Expect to Use		PII - REDACTED
PX 096		Court-Appointed Monitor's First Monitoring Report (ECF No. 12-1, filed May 3, 2017)	Expect to Use		
PX 097		Court-Appointed Monitor's Second Monitoring Report (ECF No. 16, filed August 23, 2017)	Expect to Use		
PX 098		Court-Appointed Monitor's Third Monitoring Report (ECF No. 19, filed December 11, 2017)	Expect to Use		
PX 099		Court-Appointed Monitor's Fourth Monitoring Report (ECF No. 22, filed April 18, 2018)	Expect to Use		
PX 100		Court-Appointed Monitor's Fifth Monitoring Report (ECF No. 23, filed August 1, 2018)	Expect to Use		
PX 101		Court-Appointed Monitor's Sixth Monitoring Report (ECF No. 24, filed November 15, 2018)	Expect to Use		
PX 102		Court-Appointed Monitor's Seventh Monitoring Report (ECF No. 27, filed March 5, 2019)	Expect to Use		
PX 103		Court-Appointed Monitor's Eighth Monitoring Report (ECF No. 33, filed June 27, 2019)	Expect to Use		

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PX 104		Court-Appointed Monitor's Ninth Monitoring Report (ECF No. 46, filed November 13, 2019)	Expect to Use		
PX 105		Department of Justice Notice of Non-Compliance, dated January 10, 2019 (ECF No. 30-1, filed June 24, 2019)	Expect to Use		
PX 106		Department of Justice Supplement to Notice of Non-Compliance, dated January 24, 2019 (ECF No. 30-2, filed June 24, 2019)	Expect to Use		
PX 107		Transcript excerpt regarding April 19, 2019 riot (ECF No. 30-3, filed June 24, 2019)	Expect to Use		
PX 108		Transcript excerpt re Austin Thigpen hiring (ECF No. 30-5, filed June 24, 2019)	Expect to Use		
PX 109		Letter from Sheriff Victor Mason to Department of Justice - Response to Notice of Non-Compliance and Supplemental Notice of Non-Compliance dated March 4, 2019 (ECF No. 30-6, filed June 24, 2019)	Expect to Use		
PX 110		Letter from Hinds County Board of Supervisors to Department of Justice - Response to Notice of Non-Compliance and Supplemental Notice of Non-Compliance dated March 4, 2019 (ECF No. 30-7, filed June 24, 2019)	Expect to Use		
PX 111		Priority Recommendations, June 2018 (ECF No. 30-8, filed June 24, 2019)	Expect to Use		

Hearing Exhibit #	Deposition Exhibit #	Hearing Exhibit Description	Expect to Use / May Use	Defendant's Objections	Confidentiality
PX 112		Incident Report for Incident #181913 (ECF No. 30-4, filed June 24, 2019)	Expect to Use		PII - REDACTED
PX 113		Incident Narratives By Date for August 2019	Expect to Use		Offered Under Seal
PX 114		Settlement Agreement Between The United States of America and Hinds County, Mississippi Regarding the Hinds County Jail (ECF No. 8-1, filed July 19, 2016)	Expect to Use		
PX 115		Incident Report for Incident #1900734	May Use		PII - REDACTED
PX 116		Supplemental Narrative for Incident #1900342	Expect to Use		
PX 118		Incident Report for Incident #191331	Expect to Use		PII - REDACTED
PX 119		Incident Report for Incident #1900616	Expect to Use		PII - REDACTED
PX 120		Incident Report for Incident #1900713	Expect to Use		PII - REDACTED
PX 121		Incident Report for Incident #1900758	Expect to Use		
PX 122		Incident Report for Incident #1900882	Expect to Use		
PX 123		Incident Report for Incident #1900908	Expect to Use		PII - REDACTED
PX 124		Incident Report for Incident #1900928	Expect to Use		PII - REDACTED
PX 125		Incident Report for Incident #1900972	Expect to Use		
PX 126		Incident Report for Incident #191111	Expect to Use		PII - REDACTED
PX 127		Incident Report for Incident #191139	Expect to Use		PII - REDACTED
PX 128		Incident Report for Incident #191145	Expect to Use		PII - REDACTED
PX 129		Incident Report for Incident #191148	Expect to Use		PII - REDACTED
PX 130		Incident Report for Incident #191162	Expect to Use		PII - REDACTED
PX 131		Incident Report for Incident #191294	Expect to Use		PII - REDACTED
PX 132		Incident Report for Incident #191336	Expect to Use		PII - REDACTED
PX 133		Incident Report for Incident #191419	Expect to Use		PII - REDACTED
PX 134		Incident Report for Incident #191429	Expect to Use		PII - REDACTED
PX 135		Incident Report for Incident #1900514	Expect to Use		PII - REDACTED

Hearing Exhibit #	Deposition Exhibit #	Hearing Exhibit Description	Expect to Use / May Use	Defendant's Objections	Confidentiality
PX 136		Video clip: 3 On Your Side Investigates: Jailed and Abused	Expect to Use		
PX 137		Information sheet regarding 3 On Your Side Investigates: Jailed and Abused	May Use		
PX 138		Email from Lisa Simpson to Claire Barker and others, dated June 15, 2018 regarding Priority Recommendations	Expect to Use		
PX 139		Priority Recommendations, June 2018	Expect to Use		
PX 140		Email from Lisa Simpson to Carmen Davis and others, dated October 8, 2019 regarding RDC door repairs	Expect to Use		
PX 141		Summary of RDC Door Renovation as Discussed During September Site Visit	Expect to Use		Offered Under Seal
PX 142		Email from Lisa Simpson to Claire Barker and others, dated February 9, 2019 regarding Suggested Process for Addressing Staffing Needs	Expect to Use		
PX 143		Suggested Steps to Addressing Staffing Needs	Expect to Use		
PX 144		Video #1 of Incident #191577, October 6, 2019 (Camera 1)	Expect to Use		
PX 145		Video #2 of Incident #191577, October 6, 2019	Expect to Use		
PX 146		Video #3 of Incident #191577, October 6, 2019	Expect to Use		
PX 147		Video #4 of Incident #191577, October 6, 2019	Expect to Use		
PX 148		Video of Incident #191583, October 8, 2019	Expect to Use		
PX 149		Clarion Ledger - Inmate Beating Fellow Prisoner Caught on Video	Expect to Use		

Hearing Exhibit #	Deposition Exhibit #	Hearing Exhibit Description	Expect to Use / May Use	Defendant's Objections	Confidentiality
PX 150		Required Positions - Detention Administration	May Use		
PX 151		Required Positions - Jackson Detention Center	May Use		
PX 152		Required Positions - Raymond Detention Center	May Use		
PX 153		Required Positions - Work Center	May Use		
PX 154		Policies and Procedures Table of Contents	May Use		
PX 155		Policies and Procedures Tracking Log	May Use		
PX 156		Memorandum from Major Mary Rushing to Captain Vincent Williams regarding Update on C-Pod Renovations	Expect to Use		Offered Under Seal